

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff

v.

EDWIN LEWIS,

Defendant

3:CR-16-288

(JUDGE MANNION)

ELECTRONICALLY  
FILED

**MOTION FOR GRAND JURY TRANSCRIPTS**  
**Pursuant to Fed. R. Crim. P. Rule 6(e)(3)©(ii)**

AND NOW, comes the Defendant, by and through his counsel,  
Thomas B. Helbig, Esquire, and moves for pre-trial disclosure of Grand Jury transcripts  
pursuant to Fed.R.Crim.P. Rule 6(e)(3)(C)(ii) and sets forth the following in support  
thereof:

1. Defendant believes and alleges that a number of individuals, both  
charged and uncharged, have appeared before the Federal Grand Jury and given  
testimony against the Defendant.

2. Several of the witnesses who may have testified before the Grand Jury are percipient witnesses of the acts and events that underlie the Indictment and charges against the Defendant and against which she must defend at trial.

3. In order to effectively cross-examine the witnesses against her, both those who appear at trial and those who do not, the Defendant requests production of transcripts of the testimony of these individuals before the Grand Jury. See: Pittsburgh Plate Glass Co. v. United States, 360 U. S. 395,400 (1950); United States v. Perez, 67 F.3d 1371 (9<sup>th</sup> Cir. 1995).

WHEREFORE, the Defendant respectfully requests pre-trial disclosure of the Grand Jury transcripts.

Respectfully submitted,

BY s/ Thomas B. Helbig  
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